

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Andrew Ian White, Debtor**

**Case No. 25-00752-JAW  
CHAPTER 13**

**NOTICE**

Debtor has filed papers with the court to adjust the plan payments.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to amend the Plan, or if you want the court to consider your views on the Motion, then on or before 30 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk  
U.S. Bankruptcy Court  
P.O. Box 2448  
Jackson, MS 39225-2448

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236  
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion.

Date: June 19, 2025

Signature: /s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr. (MSBN 103469)  
Jennifer Ann Curry Calvillo (MSBN 104367)  
The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236

**IN THE UNITED STATES BANKRUPTCY COURT  
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**IN RE: Andrew Ian White, Debtor**

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**MOTION TO ADJUST PLAN PAYMENT**

COMES NOW, Debtor, by and through counsel, and moves this Court to adjust the plan payments, and in support thereof, would show the Court as follows:

1. Debtor commenced this case on March 21, 2025, by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. That the bar date for filing proof of claims was May 30, 2025, for all creditors and September 17, 2025, for government entities.
3. That all expected government claims have been filed.
4. That Debtor's monthly plan payment should be recalculated to only pay timely filed claims over the full sixty (60) months of the plan.

WHEREFORE, Debtor prays that the Trustee recalculate the plan payment to pay only the timely filed claims over the full sixty (60) months through their bankruptcy plan and for such additional or alternative relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MS Bar No. 103469)

Of Counsel:

Thomas C. Rollins, Jr.  
Jennifer Ann Curry Calvillo  
The Rollins Law Firm, PLLC  
P.O Box 13767  
Jackson, MS 39236  
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Motion were forwarded on June 19, 2025, to:

By Electronic CM/ECF Notice:

Chapter 13 Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:  
ANDREW IAN WHITE

CASE NO: 25-00752-JAW

**DECLARATION OF MAILING  
CERTIFICATE OF SERVICE**

Chapter: 13

On 6/20/2025, I did cause a copy of the following documents, described below,  
Notice and Motion to Adjust Plan Payment

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 6/20/2025

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr.

Attorney at Law

The Rollins Law Firm

702 W. Pine Street

Hattiesburg, MS 39401

601 500 5533

trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:  
ANDREW IAN WHITE

CASE NO: 25-00752-JAW

**CERTIFICATE OF SERVICE  
DECLARATION OF MAILING**

Chapter: 13

On 6/20/2025, a copy of the following documents, described below,  
Notice and Motion to Adjust Plan Payment

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 6/20/2025



Miles Wood  
BK Attorney Services, LLC  
d/b/a certificateofservice.com, for  
Thomas C. Rollins, Jr.  
The Rollins Law Firm  
702 W. Pine Street  
Hattiesburg, MS 39401

## USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

## CASE INFO

LABEL MATRIX FOR LOCAL NOTICING  
NCRS ADDRESS DOWNLOAD  
CASE 25-00752-JAW  
SOUTHERN DISTRICT OF MISSISSIPPI  
FRI JUN 20 8-0-15 PST 2025

~~EXCLUDE~~

~~US BANKRUPTCY COURT  
THAD COCHRAN US COURTHOUSE  
501 E COURT STREET  
SUITE 2300  
JACKSON MS 39201 5036~~

CAPITAL COMMUNITY BANK  
ATTN BANKRUPTCY  
3422 OLD CAPITAL TRAIL  
WILMINGTON DE 19808-6124

CROSSWINDS APARTMENTS  
440 CROSS PARK DR  
PEARL MS 39208-8982

KINGSTON DATA  
ATTN BANKRUPTCY  
1301 SEMINOLE BLVD  
UNIT 166  
LARGO FL 33770-8118

(P)LEAFY FINANCIAL LLC  
2921 BROWN TRAIL STE 250  
BEDFORD TX 76021-4176

MDG USA INC  
3422 OLD CAPITOL TRAIL PMB 1993  
WILMINGTON DE 19808-6124

MARINER FINANCE  
8211 TOWN CENTER DR  
NOTTINGHAM MD 21236-5904

NAVY FEDERAL CREDIT UNION  
POBOX 3000  
MERRIFIELD VA 22119-3000

NAVY FEDERAL CU  
ATTN BANKRUPTCY  
PO BOX 3302  
MERRIFIELD VA 22119-3302

(P)POSSIBLE FINANCIAL INC  
PO BOX 98686  
LAS VEGAS NV 89193-8686

SCOLOPAX LLC  
CO WEINSTEIN RILEY PS  
749 GATEWAY SUITE G-601  
ABILENE TX 79602-1196

(P)SIMPLE FAST LOANS INC  
ATTN ATTN LEGAL DEPARTMENT  
8601 DUNWOODY PLACE SUITE 406  
ATLANTA GA 30350-2550

(P)TOWER LOAN  
P O BOX 320001  
FLOWOOD MS 39232-0001

TOWER LOAN OF MISSISSIPPI LLC  
PO BOX 320001  
FLOWOOD MS 39232-0001

~~EXCLUDE~~

~~UNITED STATES TRUSTEE  
501 EAST COURT STREET  
SUITE 6 430  
JACKSON MS 39201 5022~~

WFC  
ATTN BANKRUPTCY  
PO BOX 6429  
GREENVILLE SC 29606-6429

WORLD ACCEPTANCE CORP  
WORLD ACCEPTANCE CORPORATION ATTN BANK  
PO BOX 6429  
GREENVILLE SC 29606-6429

## DEBTOR

ANDREW IAN WHITE  
516 ROSS NEAL RD  
PELAHATCHIE MS 39145-2796

~~EXCLUDE~~

~~HAROLD J BARKLEY JR  
PO BOX 4476  
JACKSON MS 39296 4476~~

THOMAS CARL ROLLINS JR  
THE ROLLINS LAW FIRM PLLC  
PO BOX 13767  
JACKSON MS 39236-3767